

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

ROSALEE WILSON, et al.,

\*

*Plaintiffs*

\*

VS.

\*

MICHAEL TURNER, et al.,

\*

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Civil Case No. 13-3497 ELH

*Defendants*

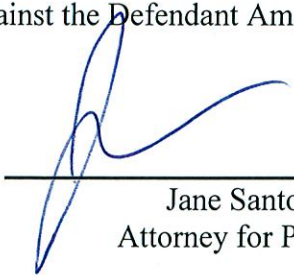
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**AFFIDAVIT IN SUPPORT OF**  
**MOTION FOR ENTRY OF DEFAULT**

I, Jane Santoni, being duly sworn, state as follows:

1. I am the attorney for the Plaintiffs, Quintel Wilson and Rosalee Wilson in the above-entitled action and I am familiar with the file, records and pleadings in this matter.
2. The summons and complaint were filed electronically on November 20, 2013.
3. Defendant America's Financial Trust, LLC was served with a copy of the summons and complaint on January 15, 2014, as reflected on the docket sheet by the proof of service filed on April 24, 2014.
4. An answer to the complaint was due on February 5, 2014.
5. Defendant America's Financial Trust, LLC has failed to appear, plead or otherwise defend within the time allowed and, therefore, is now in default.
6. Plaintiff requests that the clerk of court enter default against the Defendant America's Financial Trust, LLC



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Jane Santoni, Esq.  
Attorney for Plaintiffs